

### **Remarks**

In the Office Action, the Examiner issued a restriction requirement and restricted out claims 64-74. The Examiner also objected to the specification as failing to provide proper antecedent basis for the claimed subject matter. The Examiner also rejected claims 46-51 under 35 U.S.C. §101. The Examiner also rejected claims 20, 24-27, 31, 35-37, 42-44, 46-50, 52, 53, 56-58, and 63 under 35 U.S.C. §102(e) as being anticipated by the U.S. Patent 6,404,445 issued to Galea, et al. ("Galea"). The Examiner also rejected claims 59-62 under 35 U.S.C. §103(a) as being unpatentable over Galea in view of the U.S. Patent 7,076,784 issued to Russell, et al. ("Russell"). The Examiner also rejected claims 21-22 under 35 U.S.C. §103(a) as being unpatentable over Galea in view of the U.S. Patent 6,564,218 issued to Roth ("Roth"). The Examiner also rejected claims 23, 32, and 51 under 35 U.S.C. §103(a) as being unpatentable over Galea in view of the U.S. Patent 7,093,263 issued to Sexton, et al. ("Sexton"). The Examiner also rejected claim 38 under 35 U.S.C. §103(a) as being unpatentable over Galea in view of the U.S. Patent 5,818,936 issued to Mashayekhi ("Mashayekhi").

In this Amendment, Applicants have amended claims 20, 27, 35, 36, 42, and 44. Applicants have added claims 75 and 76. However, Applicants have not canceled any claims. Accordingly, claims 20-27, 31-32, 35-38, 42-44, 46-53, 56-63, 75, and 76 will be pending after entry of this Amendment.

## **I. Telephone Interview**

Applicants respectfully thank the Examiner and his primary for the courtesies extended during the telephone interview conducted on April 16, 2008. In the telephone interview, the Examiner and his primary suggested further defining several terms (i.e., entities, description) in the claims.

## **II. Restriction of claims 64-74**

In the Office Action, the Examiner withdrew newly submitted claims 64-74. Applicants have previously canceled claims 64-74.

## **III. Objection to Specification**

In the Office Action, the Examiner objected to the specification. Specifically, the Examiner stated that the specification fails to provide proper antecedent for claim 59 because the claim recites “first and second users having different roles”.

Applicants respectfully submit the specification provides support for the recitation. For example, in describing custom user interface generation of some embodiments, the specification states, “if client 215 identifies itself or states as a preference that the user interface would be used by a sales person, then pricing and product information may be made the prominent or most easily accessible of the data in database 210 rather than human resource information which may be of less interest to the eventual user.” *See Specification, page 16, line 27-page 17, line 6.* Clearly, in this example, one of ordinary skill in the art would understand that sales person is a role assigned to a user, and based on this role, the user is provided with a user interface that displays sales information more prominently than human resource information.

Accordingly, Applicants respectfully request withdrawal of the specification objection.

**IV. Rejection of claims 46-51 under 35 U.S.C. §101**

In the Office Action, the Examiner rejected claims 46-51 under §101 as being directed towards non-statutory subject matter. Specifically, the Examiner stated that the claims are directed to software *per se* because it includes a server and a database.

Applicants respectfully disagree that a system is directed towards software *per se* if it includes a database and a server. According to the MPEP, software is not *per se* non-statutory, but is only non-statutory when it exists as a description. *See* MPEP § 2106.01(I). Here, the server and database are described in terms that indicate they are each a part of a physical structure. For example, the system is described as having a server communicatively coupled to the database for creating a description of a user interface. If the system were merely descriptive, then the two parts of the system (the server and the database) could not be described as being communicably coupled to each other. Accordingly, Applicants respectfully submit that the system of claim 46 is directed toward statutory subject matter.

In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the §101 rejection of claims 46-51.

**V. Rejection of claims 20-27**

In the Office Action, the Examiner rejected claim 20 under §102(c) as being anticipated by Galea. Claims 21-27 are dependent directly or indirectly on claim 20. Claim 20 recites a method for creating a description of a user interface that transacts with

a database. The database has a data model that includes several entities. The description is created using the data model of the database. The method receives a request for the user interface from a client. After receiving the request, the method classifies the entities into entity types. In classifying, the method determines whether a first entity satisfies a first set of conditions and classifies the first entity as a first entity type upon determining that the first entity satisfies the first set of conditions. The method distributes the description to the client in order to allow the client to generate elements of the user interface that permits a user to transact with said database.

For at least the following reasons, Applicants respectfully submit that Galea does not disclose all claim limitation to anticipate claim 20. For instance, Galea does not disclose classifying entities into entity types after receiving a request from a client. By contrast, in Galea, after a user accesses a domain (i.e., product or service) through a client, an interactive decision map for that domain is retrieved and sent to the client. *See Galea, column 7, lines 42-46.*

Specifically, as described by Galea, when a browser application requests information from a server, a server manager downloads the appropriate interactive decision map and sends the interactive decision map. *See Column 11, line 1-4.* Thus, in Galea, after a request from a client, the interactive decision map is retrieved and sent, but no such classification of entities is performed.

Accordingly, Applicants respectfully submit that Galea does not render claim 20 unpatentable. As claims 21-27 are dependent directly or indirectly on claim 20, Applicants respectfully submit that claims 21-27 are patentable over Galea for at least the

reasons discussed above for claim 20. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 20-27.

#### **VI. Rejection of claims 31-33**

In the Office Action, the Examiner rejected claim 31 under §102(e) as being anticipated by Galea. Claims 32 and 33 depend directly on claim 31. Claim 31 recites a computer readable medium storing a computer program which when executed by at least one processor creates a description of a user interface. The user interface transacts with a database having a data model that includes several entities. The description is created using the data model. The computer program has instructions for classifying the entities into entity types. In classifying, the computer program determines whether a first entity satisfies a first set of conditions and classifies the first entity as a first entity type upon determining that the first entity satisfies the first set of conditions. The computer program has instructions for creating the description of the user interface based upon the classification of the entities.

For at least the following reasons, Applicants respectfully submit that Galea does not disclose all claim limitations to anticipate claim 31. For instance, Galea does not disclose a computer program that has instructions for classifying entities into entity types. In Galea, a user inputs information into a modeling application to specify graphical user elements such as list box, radio buttons, click boxes, etc. *See* Galea, Figure 8. Clearly, the user inputting this information is not a computer program and certainly isn't the computer program that is recited in the claim. For example, the user inputting the information is not the computer program that has instructions for classifying the entities

into entity types by determining whether an entity satisfies a set of conditions and classifying the entity as an entity type upon determining that the entity satisfies the set of conditions. As such, Galea does not disclose the computer readable medium that is recited in 31.

Accordingly, Applicants respectfully submit that Galea does not render claim 31 unpatentable. As claims 32 and 33 are dependent directly on claim 31, Applicants respectfully submit that claims 32 and 33 are patentable over Galea for at least the reasons discussed above for claim 31. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 31-33.

## **VII. Rejection of claims 35-38**

In the Office Action, the Examiner rejected claim 35 under §102(e) as being anticipated by Galea. Claims 36-38 depend directly on claim 35. Claim 35 recites a method for generating a user interface that transacts with a database. The database has a data model that includes several entities. The method sends a request for the user interface. The method receives a description of the user interface that is based upon classification of several entities into entity types. The classification of the entities into entity types is initiated by the request. The classification includes classification of a first entity as a first entity type upon determination that the first entity satisfies a first set of conditions. The method generates the user interface using the description of the user interface. The user interface allows the user to transact with the database.

For at least the following reasons, Applicants respectfully submit that Galea does not disclose all claim limitation to anticipate claim 35. The Office Action rejected claim

35 under the same rationale as claim 20. Accordingly, for reasons similar to those stated above for claim 20, Applicants respectfully submit that Galea does not disclose sending a request for a user interface, where the classification of entities into entity types is initiated by the request.

Accordingly, Applicants respectfully submit that Galea does not render claim 35 unpatentable. As claims 36-38 are dependent directly on claim 35, Applicants respectfully submit that claims 36-38 are patentable over Galea for at least the reasons discussed above for claim 35. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 35-38.

### **VIII. Rejection of claims 42-44**

In the Office Action, the Examiner rejected claim 42 under §102(e) as being anticipated by Galea. Claims 43 and 44 are dependent directly on claim 42. Claim 42 recites a computer readable medium storing a computer program which when executed by at least one processor generates a user interface. The user interface transacts with a database having a data model that includes several entities. The computer program has a set of instructions for receiving a description of the user interface. The description is based on classification of the entities into entity types. The classification includes the classification of a first entity as at least one of a first and second entity types upon determination that the first entity satisfies a first set of conditions. The computer program has a set of instructions for generating the user interface using the description of the user interface.

For at least the following reasons, Applicants respectfully submit that Galea does not disclose the computer readable medium of claim 42. For instance, Galea does not disclose receiving a description a user interface, where the description is based on classification of entities into entity types. The Office Action cited column 5, lines 23-50, of Galea, as disclosing such description.

The cited section describes tags that may indicate a type of GUI element such as a radio button, list box, etc. In describing the tags, Galea states that they are all entered by a user using a modeling application. *See* Galea, column, 11, lines 46-15. The modeling application in which the user enters information into these tags to indicate the type of GUI element is shown by Galea's Figure 8. As shown, a user using the modeling application can enter information into various fields and hit submit or reset. However, what is not shown in the figure or in the cited section is the set of conditions for classifying an entity into an entity type.

Accordingly, Applicants respectfully submit that Galea does not render claim 42 unpatentable. As claims 43 and 44 are dependent directly on claim 42, Applicants respectfully submit that claims 43 and 44 are patentable over Galea for at least the reasons discussed above for claim 42. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 42-44.

#### **IX. Rejection of claims 46-51**

In the Office Action, the Examiner rejected claim 46 under §102(c) as being anticipated by Galea. Claims 47-51 are dependent directly or indirectly on claim 46. Claim 46 recites a system that includes a database that has a data model including several

entities. The system includes a server coupled communicatively to the database. The server creates a description of a user interface that transacts with the database. The description is based on classification of the entities into entity types. The classification includes classification of the first entity as a first entity type upon determination that a first entity satisfies a first set of conditions.

Applicants respectfully submit that Galea does not disclose the system of claim 46. In the Office Action, the Examiner rejected claim 46 under the same rationale as claim 42. Accordingly, for reasons similar to those stated above for claim 42, Applicants respectfully submit that Galea does not disclose creating a description, where the description is based on classification of entities into entity types.

Accordingly, Applicants respectfully submit that Galea does not render claim 46 unpatentable. As claims 47-51 are dependent directly or indirectly on claim 46, Applicants respectfully submit that claims 46-51 are patentable over Galea for at least the reasons discussed above for claim 46. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 46-51.

#### **X. Rejection of claims 52-57**

In the Office Action, the Examiner rejected claim 52 under §102(e) as being anticipated by Galea. Claims 53-57 are dependent directly or indirectly on claim 52. Claim 52 recites a computer that includes a description of a data store. The computer includes a browser. The computer includes an application for generating user interface elements by using the description and by retrieving a data set from the data store to populate at least one user interface element. The user interface elements are for

displaying in the browser, where at least one user interface element is for receiving queries for the data store.

Applicants respectfully submit that Galea does not disclose the computer of claim 52. For instance, Galea does not disclose a computer that includes an application for generating a user interface by using a description and by retrieving a data set from a data store to populate at least one user interface element. Instead, Galea describes compilation of a configuration domain into a secure, binary compressed format. *See* Galea, column 5, lines 51-59. Specifically, Galea states that all valid information and possible configurations are downloaded at one time from the server to the client so that the user can browse the information without accessing the server. *See* Galea, column 5, line 60-column 6, line 2. In other words, Galea describes sending a file that includes all configuration information for the user interface at once. This is in contrast to generating a user interface elements by using a description and by retrieving a data set from a data store to populate at least one user interface element.

Accordingly, Applicants respectfully submit that Galea does not render claim 52 unpatentable. As claims 53-57 are dependent directly or indirectly on claim 52, Applicants respectfully submit that claims 53-57 are patentable over Galea for at least the reasons discussed above for claim 52. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 52-57.

## **XI. Rejection of claims 58 and 63**

In the Office Action, the Examiner rejected claim 58 under 35 U.S.C. §102(e) as being anticipated by Galea. Claim 63 is dependent directly on claim 58. Claim 58 recites

a method that receives a first request for a first user interface to transact with a first data store. The method supplies a first description to generate the first user interface. The method receives a second request for a second user interface to transact with a second data store. The method supplies a second description to generate the second user interface. The first and second descriptions differ.

For at least the following reasons, Applicants respectfully submit that Galea does not disclose the method of claim 58. For instance, the cited reference does not disclose supplying a first description to transact with a first data store and a second description to transact with a second data store. The Office Action cited Galea, column 5, lines 19-22. *See* Office Action, page 19. The databases in this cited section refers to (1) product/GUI database and (2) and interactive decision map database. In Galea, data in the product/GUI database is compiled into an interactive decision map. *See* Galea, column 6, lines 52-55. Figure 3 of Galea shows a database of the interactive decision map.

Although Galea discloses these two databases, Galea does not disclose supplying one description to transact with the product/GUI database and supplying another description to transact with the interactive decision map database. Instead, a user downloads the interactive decision map from a server to view product detail. *See* Galea, column 5, line 67, to column 6, lines, 1-2. Thus, in Galea, two descriptions are not supplied to transact with two data stores.

Accordingly, Applicants respectfully submit that Galea does not render claim 58 unpatentable. As claim 63 is dependent directly on claim 58, Applicants respectfully submit that claim 63 is patentable over Galea for at least the reasons discussed above for

claim 58. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 58 and 63.

### **XII. Rejection of claims 59-62**

In the Office Action, the Examiner rejected claim 59 under §103(a) as being unpatentable over Galea in view of Russell. Claims 60-62 are dependent directly or indirectly on claim 59. Claim 59 recites a method for providing descriptions of user interfaces to users. The user interfaces are for transacting with a data store. The method receives a first request from a first user. The method receives a second request from a second user. The first and second users have different roles. The method supplies a first description to the first user and a second description to the second user. The first and second descriptions are different based on the roles of the users.

Applicants respectfully submit that the combination of references do not disclose the method of claim 59. For instance, the cited references, alone or in combination, do not disclose supplying different descriptions of user interfaces based on the roles of the users. The Office Action cited, Russell, column 44, lines 33-45, of Russell as disclosing the supplying operations as recited in the claim. *See* Office Action, page 27. However, the cited section does not describe supplying different descriptions based on the roles of the users. Instead, the cited section describes assigning access privileges to a package. Specifically, Russell describes a developer that assigns access privileges of a role to the package so that users operating under that role have certain access to the package. Therefore, the cited references do not disclose supplying different descriptions based on the role of the users.

Accordingly, Applicants respectfully submit that the cited references do not render claim 59 unpatentable. As claims 60-62 are dependent directly or indirectly on claim 59, Applicants respectfully submit that claims 60-62 are patentable over the cited references for at least the reasons discussed above for claim 59. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 59-62.

### **XIII. New claims 75 and 76**

In this Amendment, Applicants has added claims 75 and 76. Applicants respectfully submit that new claims 75 and 76 are fully supported by the disclosure and are patentable over the cited references.

### **Conclusion**

In view of the foregoing, it is submitted that all pending claims, namely claims 20-27, 31-32, 35-38, 42-44, 46-53, 56-63, 75, and 76 are in condition for allowance. Reconsideration of the rejections and objections is requested. Allowance is earnestly solicited at the earliest possible date.

Applicants have submitted the fees for the additional claims and petition for the extension of time and RCE. Applicants believe that no additional fee is required for the submission of this amendment and response. However, in the unlikely event that the Commissioner determines that additional fee, extension and/or other relief is required, Applicants petition for any required relief including extensions of time. Moreover, Applicants authorize the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to **Deposit Account No. 50-3804** referencing **APLE.P0004C**.

Respectfully submitted,

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